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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

RHIANNON STEWART,

Defendant.

CASE NO. 3:22-CR-00461-002 JD

**STIPULATION TO CONTINUE CHANGE OF
PLEA TO JULY 15, 2024, AND EXCLUDE TIME
UNTIL THAT DATE; ORDER**

WHEREAS, there presently is a change-of-plea hearing scheduled in the above-captioned matter for June 17, 2024;

WHEREAS, the parties have agreed to resolve the case but would benefit from additional time to finalize their agreement and to ensure effective preparation in view of the extensive discovery already produced, which defense counsel is continuing to review; and

WHEREAS, defense counsel has a court conflict on June 24, 2024, and is out of town and unavailable on July 1, 2024, and July 8, 2024.

IT IS HEREBY STIPULATED AND AGREED by and between counsel for the United States and counsel for the defendant, Rhiannon STEWART, that the change-of-plea hearing presently

1 scheduled for June 17, 2024, be continued to July 15, 2024, and that time be excluded under the Speedy
2 Trial Act for the duration of that time.

3 The government and counsel for the defendant agree that time should be excluded under the
4 Speedy Trial Act so that defense counsel may continue to prepare, including by reviewing the discovery
5 already produced. For these reasons, the parties stipulate and agree that excluding time until July 15,
6 2024, will allow for the effective preparation of counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv). The parties
7 further stipulate and agree that the ends of justice served by excluding the time from June 17, 2024,
8 through July 15, 2024, from computation under the Speedy Trial Act outweigh the best interests of the
9 public and the defendant in a speedy trial. *See* 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

10 The undersigned Assistant United States Attorney certifies that he has obtained approval from
11 counsel for the defendant to file this stipulation and proposed order.

12 **IT IS SO STIPULATED.**

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14 DATED: June 14, 2024

Respectfully submitted,

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16 ISMAIL J. RAMSEY
United States Attorney

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18 /s/ Nicholas Parker
NICHOLAS M. PARKER
19 Assistant United States Attorney

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21 DATED: June 14, 2024

/s/ Elizabeth Falk
ELIZABETH FALK
22 Counsel for Defendant STEWART
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ORDER

Based upon the facts set forth in the stipulation of the parties, and for good cause shown, the Court (i) continues the change-of-plea hearing presently set for June 17, 2024, to July 15, 2024; and (ii) finds that failing to exclude the time from June 17, 2024, through July 15, 2024, would unreasonably deny defense counsel and the defendant the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. *See* 18 U.S.C. § 3161(h)(7)(B)(iv).

The Court further finds that the ends of justice served by excluding the time from June 17, 2024, through July 15, 2024, from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. Therefore, and with the consent of the parties, IT IS HEREBY ORDERED that (i) the change-of-plea hearing presently set for June 17, 2024, is continued to July 15, 2024; and (ii) the time from June 17, 2024, through July 15, 2024, shall be excluded from computation under the Speedy Trial Act. *See* 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

IT IS SO ORDERED.

DATED: 6/14/2024



HON. JAMES DONATO
United States District Judge